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August 26, 2018

Via ECF

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

Re: *John Nypf et al. v. JP Morgan Chase & Co et al.*, 15 Civ. 9300 (LGS)

Dear Judge Schofield:

As the Court may be aware, a verdict was rendered in the Government's case today, Friday, October 26, 2018.

Consequently, Pursuant to Rule III.A.1 of Your Honor's Individual Rules of Practice for Civil Cases, the *Nypf* Plaintiffs respectfully file this letter motion seeking a pre-motion conference to lift and vacate the stay of this Court's Order of September 25, 2018, ECF NO. 355, which prohibited the *Nypf* plaintiffs from taking the depositions of the signatories to the Plea Agreements and Deferred Prosecution Agreement (and/or other witnesses competent to testify to the substance of the Pleas at trial).

In addition, and in light of the conclusion of the Government's criminal case, the *Nypf* plaintiffs respectfully file this letter motion seeking a pre-motion conference to take the depositions of the participants in the "Cartel" chatroom; namely, Messers Matthew Gardiner, Christopher Ashton, Richard Usher, and Rohan Ramchandani.

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Finally, the *Nypl* plaintiffs respectfully file this letter motion seeking a pre-motion conference requiring the Government to (1) identify the witnesses identified by the defendant banks as the appropriate persons to competently testify to the substance of the Plea Agreements and Deferred Prosecution Agreement; and (2) produce all the documents in its possession pertaining to the negotiations of the Bank Pleas.

Respectfully submitted:

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By: /s/ Joseph M. Alioto
Joseph M. Alioto

LAW OFFICES OF LINGEL H. WINTERS P. C.

By: /s/ Lingel H. Winters
Lingel H. Winters

Attorneys for Plaintiffs and the Nypl Putative class

cc: Counsel of Record via ECF
Benjamin Sirota, Department of Justice

JMA/nas